

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
MOTION FOR LEAVE TO AMEND COMPLAINT**

Defendants Merrick Garland, in his official capacity as the Attorney General of the United States of America, and Steven Dettelbach, in his official capacity as the Director of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, through undersigned counsel, hereby respond to Plaintiff's Motion for Leave to Amend Complaint (Doc. 11). Defendants are not opposed to this Motion. However, Defendants reserve all rights with respect to the proposed Amended Complaint, including the right to move to dismiss pursuant to Federal Rule of Civil Procedure 12.

Dated this 16th day of March, 2023.

Respectfully Submitted,

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By: /s/ Jeremy A. Gross

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